

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: : Chapter 7
:
Pamella Campbell, :
:
Debtor. : Case No. 17-17671 ELF

ANSWER OF FREEDOM CREDIT UNION TO DEBTOR'S
MOTION TO AVOID JUDICIAL LIEN PURSUANT TO 11 U.S.C. § 522(f)

COMES NOW, Freedom Credit Union, by and through its counsel,
Robert M. Morris, Esq., of Morris & Adelman, P.C., who answers
debtor's motion to avoid the judicial lien as follows:

1. Admitted.
2. Admitted.
3. Admitted in part. Denied in part. The purpose of the
motion is admitted. The substance of the motion is denied.
4. Admitted.
5. Admitted. By way of further answer, the judgment has
accrued interest since it was entered on March 8, 2011, and the
amount due as of November 10, 2017, was \$16,403.88.
6. Admitted in part. Denied in part. It is admitted that
the debtor's residence is located at 3861 N. Park Avenue,
Philadelphia, PA 19140. It is denied that the current market
value of the residence is \$39,000.
7. Admitted.
8. Denied. To the contrary, the Midland Funding, LLC,
judgment was entered on July 3, 2012, and the lien of the

judgment expired on July 3, 2017, without having been revived prior to the filing of the bankruptcy. There is no Midland Funding, LLC, lien. Even if it had been revived prior to expiration, it would still be subordinate since Freedom Credit Union's judgment was entered on March 8, 2011, and revived on February 11, 2016, with the completion of service of the court-issued writ of revival.

9. Admitted.

10. Denied.

11. Denied.

WHEREFORE, the debtor's motion to avoid the judicial lien should be denied.

DATED: February 8, 2018

/s/Robert M. Morris, Esq.
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